

EXHIBIT 1

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

DANIEL CARNINE, CHAD
WEAVER, JEFFREY JORDAN,
THOMAS MACKEY, AND TORY
SKYERS, on behalf of themselves and
all other individuals similarly situated,

Plaintiffs,

v.

GENERAL MOTORS LLC, ONSTAR
LLC, and LEXISNEXIS RISK
SOLUTIONS, INC.,

Defendants.

Case No. 2:24-cv-11004

**CLRA VENUE AFFIDAVIT
PURSUANT TO CAL. CIV.
CODE § 1780(d)**

I, Amber L. Schubert, declare as follows:

1. I am a partner of Schubert Jonckheer & Kolbe LLP, counsel for Plaintiff Daniel Carnine in this action. I have personal knowledge of the facts stated herein and, if called upon to do so, could competently testify thereto.

2. I submit this declaration on behalf of Plaintiff Carnine in support of the Class Action Complaint, which is based in part on violations of the Consumers Legal Remedies Act, California Civil Code section 1750 *et seq.*

3. The Class Action Complaint has been filed in the proper place for trial of this action.

4. Defendants General Motors LLC, and OnStar LLC, (collectively “GM”) have their headquarters and principal place of business in this this District.

5. Venue is proper in this District under 28 U.S.C. § 1391 because a substantial part of the events giving rise to the claims emanated from activities within this district, and GM conducts substantial business in this District.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on April 16, 2024 in San Francisco, California.

/s/ Amber L. Schubert